

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

JANE DOE,

Plaintiff,

v.

**JONATHAN BARAM and WARREN &
BARAM MANAGEMENT LLC,**

Defendants.

Case No. 1:20-CV-09522-ER/DCF

**[PROPOSED] TEMPORARY
RESTRAINING ORDER
AND ORDER TO SHOW CAUSE**

Upon the attached Memorandum of Law in Support of Temporary Restraining Order and Order to Show Cause, and the declaration(s) and exhibits annexed thereto, and upon all prior papers and proceedings herein, it is hereby

ORDERED, DECREED, and ADJUDGED, pursuant to Fed. R. Civ. P. 65(b), that **Defendant Warren & Baram Management LLC and its principal officer Jonathan Baram** are **TEMPORARILY ENJOINED**:

1. To refrain and cease and desist from making any direct communications to anyone connected with this lawsuit, including, but not limited to, DiCello Levitt Gutzler LLC and the Haba Law Firm and any of their agents, employees, or personnel;
2. To remain at least 500 feet away from DiCello Levitt Gutzler LLC and the Haba Law Firm and any of their agents, employees, or personnel;
3. To refrain from posting, publishing, or publicly sharing, in any medium, any videos, images, fliers, documents, or comments that mention DiCello Levitt Gutzler LLC and the Haba Law Firm and any of their agents, employees, or personnel; and

4. To refrain and cease and desist from any other conduct towards Plaintiff Jane Doe or her counsel that is in any way abusive, harassing, vexatious, or contumacious.

In support of this Temporary Restraining Order, this Court **FINDS** pursuant to Fed. R. Civ.

P. 65(b)(2), as follows:

1. Plaintiff and her counsel have been injured by the conduct of Defendant Warren & Baram Management LLC and its principal officer Jonathan Baram, by virtue of the hundreds of harassing, vexatious, and threatening emails and Facebook posts Baram sent and made on January 27 and 28, 2022, and other cyberstalking conduct described in Plaintiff's memorandum and supporting papers, including the possibility that Baram has stalked the physical residence of one of Plaintiff's attorneys of record.
2. Said injury is irreparable in the absence of preliminary relief: Baram's conduct in the form of vexatious emails and Facebook posts are not only threatening to Plaintiff and her attorneys, but also make false statements about this case and disparage Plaintiffs' counsel by name. Such conduct is inherently harmful, both to Plaintiff and to the Court itself, and there is no remedy for such harm other than an order from this Court to stop it.

This Order is **ENTERED** without notice because Defendant Warren & Baram Management LLC has defaulted and is not represented by counsel, and because the irreparable harm caused by Defendant's conduct, including the threats and attempted intimidation of counsel, requires exigent and immediate relief. This Order shall be **FILED** in the Clerk's office and entered in the record of this case. Subject to further order from this Court, it shall **EXPIRE** precisely

fourteen (14) days from its entry on the docket. Any violation of this Temporary Restraining Order shall be punished as provided by law, including through the use of this Court's contempt powers.

It is further **ORDERED, DECREED, and ADJUDGED** that Defendant Warren & Baram Management LLC is directed to **SHOW CAUSE** in writing before this Court, and only if represented by counsel, within **seven (7) days** of the entry of this Order,

1. why the TRO should not be made permanent, and
2. why Defendant and its principal officer Jonathan Baram should not be sanctioned pursuant to the inherent authority of this Court, such sanction to consist of
 - a. a fine payable to this Court in the amount of \$1000, and
 - b. Plaintiff's reasonable attorney's fees incurred with respect to each of the Court submissions prompted by Defendant's and Baram's conduct, including the present motion.

It is further **ORDERED** that service of a copy of this order and the Plaintiff's motion papers upon Defendant Warren & Baram Management LLC at its last known address, 2140 Pacific Boulevard, Atlantic Beach, New York 11509, on or before _____ on _____, 2022, shall be deemed good and sufficient service thereof.

IT IS SO ORDERED.

Dated: New York, New York
_____, 2022 at ____ o'clock, AM/PM.

HONORABLE EDGARDO RAMOS
United States District Judge
Southern District of New York